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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CARLOS DEPAULA

)
) **04 CR 10062 JLT**
)
) CRIMINAL NO.
) VIOLATIONS:
) 18 U.S.C. §1028(a)(2)
) (Transfer of False
) Identification)
) Documents)
) 18 U.S.C. §1028(a)(5)
) (Possession of
) False Document-Making
) Implements)
) 18 U.S.C. §1546(a)
) (Fraud and Misuse of
) Documents)
) 18 U.S.C. §2
) (Aiding and Abetting)
)

INFORMATION

COUNT ONE: 18 U.S.C. §1028(a)(2) - Transfer of False
Identification Documents

The Grand Jury charges that:

On November 20, 2003, at Allston, in the District of
Massachusetts,

CARLOS DEPAULA,

the defendant herein, did knowingly transfer false identification
documents, to wit: six counterfeit Social Security Administration
account number cards and six counterfeit alien registration
cards, which appeared to be issued by or under the authority of

the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Section 1028(a)(2).

**COUNT TWO: 18 U.S.C. §1028(a)(2) - Transfer of False
Identification Documents**

The Grand Jury further charges that:

On or about January 8, 2004, at Allston, in the District of
Massachusetts,

CARLOS DEPAULA,

the defendant herein, did knowingly transfer false identification documents, to wit: ten counterfeit Social Security Administration account number cards and ten counterfeit alien registration cards, which appeared to be issued by or under the authority of the United States, knowing that such documents were produced without lawful authority.

All in violation of Title 18, United States Code, Section 1028(a)(2).

COUNT THREE: 18 U.S.C. §1028(a)(5) - Possession of Document-Making Implements

The Grand Jury further charges that:

On or about January 21, 2004, at Brighton, in the District of Massachusetts,

CARLOS DEPAULA,

the defendant herein, knowingly possessed document-making implements, to wit: a computer, a computer document scanner, a typewriter, a laminating machine, and a cutting board, with the intent that such document-making implements would be used in the production of false identification documents.

All in violation of Title 18, United States Code, Section 1028(a)(5).

COUNT FOUR: Title 18 U.S.C. §1546(a) - Fraud and Misuse of Documents

The Grand Jury further charges that:

From on or about November 20, 2003, and continuing until on or about January 8, 2004, at Brighton, in the District of Massachusetts,

CARLOS DEPAULA,

the defendant herein, did knowingly forge, counterfeit, alter, and falsely make documents prescribed by statute or regulation as evidence of authorized stay or employment in the United States, to wit: Social Security Administration account number cards and alien registration cards.

All in violation of Title 18, United States Code, Section 1546(a) and Title 18, United States Code, Section 2.

Respectfully submitted,

MICHAEL J. SULLIVAN
United State Attorney

By: _____
William H. Connolly
Assistant U.S. Attorney

DATED: March 2, 2004